

**UNITED STATES DISTRICT COURT**  
 for the  
 District of New Jersey of New Jersey  
 \_\_\_\_\_ Division

Lester J. Brown Jr.

Case No.

(to be filled in by the Clerk's Office)

**Plaintiff(s)**

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Quality Asset Recovery LLC

Jury Trial: (check one)  Yes  No**R E C E I V E D**

JUN 23 2022

 AT 8:30 \_\_\_\_\_ M  
 WILLIAM T. WALSH  
 CLERK
**Defendant(s)**

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

**COMPLAINT FOR A CIVIL CASE****I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	LESTER J. BROWN JR.
Street Address	324A Willow Turn
City and County	Mount Laurel Burlington County
State and Zip Code	New Jersey 08054
Telephone Number	856 437-0004
E-mail Address	les4lb@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

## Defendant No. 1

Name	Quality Asset Recovery LLC
Job or Title ( <i>if known</i> )	
Street Address	7 Foster Avenue
City and County	Gibbsboro Gloucester County
State and Zip Code	New Jersey 08026
Telephone Number	856 925-1010
E-mail Address ( <i>if known</i> )	

## Defendant No. 2

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

## Defendant No. 3

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

## Defendant No. 4

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

Federal question       Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Jurisdiction of this court arises under 15 U.S.C 1692k(d) 28 U.S.C 1331. Venue in this District is proper in that the Defendant transact business in Mount Laurel, New Jersey, Burlington County and conduct complained occurred in Mount Laurel, New Jersey, Burlington County.

The Defendant transacts business in the state of New Jersey.

### B. If the Basis for Jurisdiction Is Diversity of Citizenship

#### 1. The Plaintiff(s)

##### a. If the plaintiff is an individual

The plaintiff, *(name)* Lester J. Brown Jr. , is a citizen of the

State of *(name)* New Jersey .

##### b. If the plaintiff is a corporation

The plaintiff, *(name)* \_\_\_\_\_, is incorporated

under the laws of the State of *(name)* \_\_\_\_\_,

and has its principal place of business in the State of *(name)* \_\_\_\_\_,

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

#### 2. The Defendant(s)

##### a. If the defendant is an individual

The defendant, *(name)* \_\_\_\_\_, is a citizen of

the State of *(name)* \_\_\_\_\_ . Or is a citizen of

*(foreign nation)* \_\_\_\_\_ .

## b. If the defendant is a corporation

The defendant, (name) Quality Asset Recovery LLC, is incorporated under the laws of the State of (name) New Jersey, and has its principal place of business in the State of (name) New Jersey. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) New Jersey.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

## 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On or about 6/10/2022, Mr. Brown reviewed my credit report on "Credit Karma." On the report, Mr. Brown observed a tradeline from Quality Asset Recovery LLC. Quality Asset Recovery LLC, furnished a trade line of \$115 allegedly owned to Center for Family Guidance. Also, on 6/10/2022, Plaintiff called Center for Family Guidance, to confirm the date of service for the alleged debt using the invoice provided and find out that the true open was August 9th 2018. The re-aging and manipulation of the dates artificially lowered Plaintiff FICO scores more than if the trade line was being reported accurately.

**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The Debt Collector's violations include, but not limited to, the following: The Debt Collector violated 15 U.S.C 1692e(8) and 15 U.S.C 1692e(2) of the FDCPA by (a) reporting a third party (consumer reporting agencies) False information when it knew from its own records the true open date. (b) The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning consumer. As a result of the above violations of the FDCPA, the Defendants are liable to the Plaintiff actual damages, statutory damages and cost. WHEREFORE, Plaintiff Lester Brown respectfully demands a jury trial and request that judgement be entered in favor of Plaintiff and against the Debt Collector for Judgement for the violations occurred for violating the FDCPA.

Actual damages pursuant to 15 U.S.C 1692k(1)(2), Statutory damages pursuant to 15 U.S.C 1692k(2). Cost pursuant to 15 U.S.C 1692k(3), For such other and further relief as the Court may deem just and proper.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

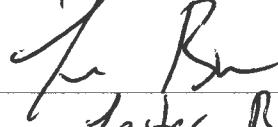
**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

6/23/22

Signature of Plaintiff



Printed Name of Plaintiff

Lester Brown

**B. For Attorneys**

Date of signing:

Signature of Attorney



Printed Name of Attorney



Bar Number



Name of Law Firm



Street Address



State and Zip Code



Telephone Number



E-mail Address

